

SA

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DAN F. ARNETT
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March 3, 2006

shudson@regstaff.sc.gov

Patricia Banks Morrison, Esquire
South Carolina Electric and Gas Company
Legal Department - 130
Columbia, SC, 29218

Mitchell M. Willoughby, Esquire
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC, 29202

Belton T. Zeigler, Esquire
Haynsworth Sinkler & Boyd, PA
Post Office Box 11889
Columbia, SC, 29211

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2006 MAR -3 PM 2:30
SC PUBLIC SERVICE
COMMISSION

RE: Annual Review of Base Rates for Fuel Costs of South Carolina Electric and Gas
Company
Docket No. 2006-2-E

Dear Ms. Morrison, Mr. Willoughby and Mr. Zeigler:

Please find enclosed and served on you the Office of Regulatory Staff's Second Continuing Data Requests in the above referenced matter. By copy of this letter we are also providing the Requests to the other parties of record. Please let me know if you have any questions.

Sincerely,

Shannon Bowyer Hudson

SBH/pjm

Enclosure

cc: Charles L.A. Terreni, Esquire
Scott Elliott, Esquire
E. Wade Mullins, III, Esquire
Damon E. Xenopoulos, Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2006-2-E

IN RE: South Carolina Electric & Gas Company's)
Annual Review of Base Rates)
for Fuel Costs)
_____)

INFORMATION
DATA REQUESTS
SET NO. 2

TO: PATRICIA BANKS MORRISON, BELTON T. ZEIGLER, MITCHELL M.
WILLOUGHBY, ATTORNEYS FOR SOUTH CAROLINA ELECTRIC & GAS
COMPANY:

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2004), the Office of Regulatory Staff hereby serves the within Data Requests upon South Carolina Electric & Gas Company (hereafter referred to as "SCE&G" or "the Company").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2004), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify or provide a document, "identify" and "provide" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When

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the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:


- I. That all information requested below, unless otherwise specified, shall be limited to Company's South Carolina Electric Retail Operations for the period under review in this docket.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Jay R. Jashinsky or John W. Flitter, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.
- IX. That the Company provide six (6) paper copies/binders of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that the Company provide an electronic version of the responses.

- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

REQUESTS:

- 2-1 For the period under review, provide the monthly kilowatt hours (KWH) generated and the associated cost of fuel per KWH for the Jasper Generating Station that was charged to the fuel clause during the time Canadys Unit #3 was not generating due to reasons other than economic dispatch.
- 2-2 For the period under review, provide the monthly kilowatt hours (KWH) generated and the associated cost of fuel per KWH for the Urquhart Gas Turbine Generators that was charged to the fuel clause during the time Canadys Unit #3 was not generating due to reasons other than economic dispatch.
- 2-3 During the time the Canadys Unit #3 was not generating due to reasons other than economic dispatch for the period under review, list the monthly kilowatt hours (KWH) and fuel cost per KWH for off system power purchases and/or interchange received and the off system power purchase and/or interchange received cost allocated to the fuel clause.
- 2-4 For 2000, 2001, 2002, 2003, 2004, and 2005 provide the dates, hours, and reasons Canadys Unit #3 was not generating due to reasons other than economic dispatch.
- 2-5 For 2000, 2001, 2002, 2003, 2004, and 2005 list each high pressure ("HP"), intermediate pressure ("IP") and low pressure ("LP") turbine and/or generator that received a major overhaul, the reason for the overhaul, and the dates and amount of time each of the Company's generating units was not running due to each unit's overhaul.
- 2-6 List all times and reasons Canadys Unit #3 has been unavailable for dispatch during 2006, excluding times of economic dispatch.

- 2-7 During the review period, records show the Canadys Unit #3 LP turbine received a major overhaul. State why this LP turbine did not receive this overhaul during the September 2002 through April 2003 period when there was an extended outage to perform maintenance on other Canadys Unit #3 turbines.
- 2-8 During the review period while Canadys Unit #3 was not available for reasons other than economic dispatch, how did the Company utilize synfuel production? If synfuel was used elsewhere during this time, state at which location it was used, how the synfuel was delivered to the other site(s) and the total costs associated with the delivery as well as the cost on a per ton basis, if applicable. If costs are associated with delivery, state to which account the costs are applied.
- 2-9 During the forecasted period, provide the projected availability and capacity factor for each of the Company's generating units per month.


Shannon Bowyer Hudson, Esquire
South Carolina Office of Regulatory Staff
PO Box 11263 (29211)
1441 Main St., Ste. 300
Columbia, SC 29201
(803) 737-0889

March 3, 2006
Columbia, SC

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2006-2-E

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IN RE:

South Carolina Electric & Gas Company)
Annual Review of Base Rates for)
Fuel Costs)

CERTIFICATE OF SERVICE

This is to certify that I, Pamela J. McMullan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **SECOND CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Patricia Banks Morrison, Esquire
South Carolina Electric and Gas Company
Legal Department - 130
Columbia, SC, 29218

Mitchell M. Willoughby, Esquire
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC, 29202

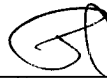
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Scott Elliott , Esquire
South Carolina Energy Users Committee
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC , 29205

E. Wade Mullins, III, Esquire
Bruner Powell Robbins Wall & Mullins, LLC
Post Office Box 61110
Columbia, SC 29260

Damon E. Xenopoulos, Esquire
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
Washington, DC 20007

Charles L.A. Terreni, Esquire
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210



Pamela J. McMullan

March 3, 2006
Columbia, South Carolina